

# **PACIFIC FISHERY MANAGEMENT COUNCIL**

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April 27, 2004

Mr. Robert Lohn, Regional Administrator  
National Marine Fisheries Service, Northwest Region  
Building 1, BIN C15700  
7600 Sand Point Way NE  
Seattle, WA 98115-0070

RE: The Pacific Coast Fishery Management Plan Bycatch Mitigation Draft Programmatic  
Environmental Impact Statement

Dear Mr. Lohn:

At its April 5-9, 2004, meeting in Sacramento, California, the Pacific Fishery Management Council (Council) reviewed the Pacific Coast Fishery Management Plan (FMP) Bycatch Mitigation Draft Programmatic Environmental Impact Statement (DPEIS) released on February 20, 2004, and identified its preferred alternative for NMFS to incorporate into the EIS. This would be identified as Alternative 7 in the Final Programmatic EIS (FPEIS) and would contain elements of several alternatives described in the DPEIS. The Council approved the following motion describing the recommended preferred alternative:

Create a new Alternative 7 that includes elements of Alternatives 1, 4, and 5. Elements from Alternative 1 that would be included in Alternative 7 would be all current programs for bycatch minimization and management, including but not limited to: setting optimum yield specifications, gear restrictions, area closures, variable trip and bag limits, season closures, establishing landings limits for target species based on co-occurrence ratios with overfished stocks, etc. The FMP would be amended to more fully describe our standardized reporting methodology program and to require the use of bycatch management measures indicated under Alternative 1 for the protection of overfished and depleted groundfish stocks and to reduce bycatch and bycatch mortality to the extent practicable. These would be used until replaced by better tools as they are developed.

Elements from Alternative 4 that would be included in Alternative 7 would be the development and adoption of sector-specific caps for overfished and depleted groundfish species where practicable. We anticipate phasing in sector bycatch caps that would include: monitoring standards, full retention programs, and individual vessel incentives for exemption from caps.

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Elements of Alternative 5 that would be included in Alternative 7 would be the support of future use of Individual Fishing Quota programs for appropriate sectors of the fishery. The FMP would incorporate the Strategic Plan's goal of reducing overcapacity in all commercial fisheries.

Additionally, baseline accounting of bycatch by sector shall be established for the purpose of establishing future bycatch program goals.

Consistent with our recommendation, we ask the EIS project team to further describe Alternative 7 as necessary for the purpose of making it consonant with the descriptions of the other alternatives and to support sufficient analysis of its impacts on the human environment, but to not change matters of intent substance.

After this action is finalized, the Council will consider undertaking preparation of a new groundfish FMP amendment consistent with the findings in the FPEIS. We look forward to working with NMFS after the release of the FPEIS to implement the policies and program direction described by the preferred alternative.

Sincerely,

A handwritten signature in black ink, appearing to read "D. O. McIsaac", with a long horizontal flourish extending to the right.

D. O. McIsaac, Ph.D.  
Executive Director

KRD:rdd